

# Firestone

TELEX NO.: 666114 or 98-64-31  
CABLE ADDRESS: FIRESTONE, AKRON, (OHIO)  
TELECOPY: 216-379-6386

May 26, 1987

Ms. Ruth Mancos  
Document Control Officer  
U.S. EPA 5HE-12  
230 South Dearborn Street  
Chicago, Illinois 60604

RECEIVED  
JUN 3 - 1987  
U.S. EPA REGION V  
WASTE MANAGEMENT DIVISION  
HAZARDOUS WASTE ENFORCEMENT BRANCH

Re: Sanitary Landfill Company (Industrial  
Waste Disposal Co., Inc.) Site on  
Cardington Road in Montgomery County, Ohio

Dear Ms. Mancos:

This letter is in reponse to the request for information relating to the above-referenced site (the "Cardington Road site") sent by Basil G. Constantelos to The Firestone Tire & Rubber Company ("Firestone") on April 20, 1987.

## Preliminary Statement

Firestone has undertaken an extensive search of its records and reviewed all documents that appeared to be directly related to the Agency's request. The only documents we have been able to locate to date that are responsive to the request are attached to this letter. Of course, should additional documents responsive to this request be discovered, we will supplement our response.

One of the attached documents is a letter dated May 7, 1980. It appears that from 1956 to 1980, some or all of the waste materials from Firestone's former tire manufacturing facility in Dayton, Ohio were disposed of under an arrangement with Industrial Waste Disposal Co., Inc. of Dayton, Ohio ("IWD"). During this period IWD transported waste from the Dayton facility to several

different disposal sites. From 1971 to 1976 some waste was taken by IWD to the Cardington Road site of Sanitary Landfill, Inc. (a subsidiary of IWD) and part was taken to another location. From 1976 to 1979 only the Cardington Road site was used for waste transported by IWD.

The records found by Firestone do not indicate the amount or nature of the waste disposed of through IWD. For the years 1971 through 1976 and the year 1979, Firestone has been unable to locate any record detailing the amount or chemical composition of waste material disposed of by the Dayton facility. For fiscal years 1977 and 1978, Firestone has located a "Solid Waste Profile" for the Dayton facility, which summarizes by general category the amounts of various waste materials "Sent to Dump or Landfill." However, Firestone has been unable to verify how much, if any, of these amounts were transported by IWD or, if so, whether they were disposed of at the Cardington Road site. Subject to this disclaimer, Firestone attaches copies of these Solid Waste Profiles.

#### Specific Responses

Subject to the foregoing discussion, Firestone responds as follows to the specific requests for information set forth in U.S. EPA's April 20, 1987 letter:

1. Not applicable.
2. Firestone attaches a letter dated May 7, 1980, which it received from IWD, summarizing the history of waste disposal from the Dayton facility. However, based on the documents reviewed to date, Firestone cannot itself verify the accuracy of the information contained in this letter.
3. The attached Solid Waste Profiles indicate that the following materials from the Dayton facility were "Sent to Dump or Landfill:" Tires, Bladders, Airbags, Flaps, Trimming Vents, Grinding Dust, Lab Test Samples, Green Tires, Bead Wire, Uncalendered Fabric (Nylon, Polyester and Fiberglas), Calendered Fabric (Steelcord), Carbon Black, Rubber (Synthetic and Natural) Machine Shop lubricants, Waste Water Treatment Solids, and Wooden Pallets. However, Firestone cannot verify any of this material was sent to the Cardington Road site.

4. See Column C in the attached Solid Waste Profiles. However, Firestone cannot determine whether any of these quantities were sent to the Cardington Road site.
5. See the attached letter dated May 7, 1980 from IWD. Firestone has not located any information relating to the type of transportation used.
6. Not applicable.
7. See the attached Solid Waste Profiles. However, Firestone cannot determine whether any of these materials went to the Cardington Road site.
8. Firestone assumes that this question, like Numbers 1 and 9, is directed to the landfill owner or operator. If directed to Firestone, the Company objects to this request on the grounds that the need for or relevancy of such information has not been established. I am not aware of any statutory provision which empowers U.S. EPA with legal authority to specifically require information on insurance coverage. If U.S. EPA is seeking information relating to Firestone's ability to pay for a site cleanup (should there be some basis for liability), the Company's Annual Report would provide sufficient evidence that adequate resources are available. Please advise if the Annual Report or additional information is required.
9. Not applicable.

Request for Confidential Treatment

Pursuant to 40 C.F.R. Part 2 and any other applicable law or statute, Firestone requests that this letter and all information contained herein or transmitted herewith be considered confidential. To the best of our present knowledge, Firestone has not disclosed this information to any other person (other than Firestone's employees or attorneys) and has taken and intends to continue to take reasonable measures to protect its confidentiality.

Firestone objects to the demand by U.S. EPA that this letter be notarized and the information and documents submitted herewith be certified, there being no such requirement contained in the statutory provisions governing the U.S. EPA's request for information, 42 U.S.C. Section 9604 or 42 U.S.C. Section 6927. Firestone also objects to U.S. EPA's vague and inaccurate reference to prosecution under 18 U.S.C. 1001. Any information provided by Firestone is based on a reasonable investigation and search of records kept in the ordinary course of business, and responses are based on that reasonable records search and investigation. 18 U.S.C 1001 applies only to knowing and willful falsification or concealment, and is not applicable to all situations where U.S. EPA claims that any information is "found to be untrue."

I trust that this addresses each of the questions raised in U.S. EPA's April 20, 1987 information request. Please address any further inquiries relating to this matter to the undersigned.

Very truly yours,

A handwritten signature in cursive script, reading "Stephen V. Moser". The signature is written in dark ink and is positioned above the printed name and title.

Stephen V. Moser  
Senior Counsel

w:\msv\7052911



INDUSTRIAL WASTE DISPOSAL CO., INC.  
P. O. BOX 1453 3975 WAGONER FORD ROAD • DAYTON, OHIO 45414  
PHONE 513 278-0821

May 7, 1980

Dayton Tire & Rubber  
P.O. Box 96  
2342 Riverside Drive  
Dayton, Ohio 45407

Attn: Mr. Ralph Ball

Dear Mr. Ball:

The purpose of this letter is to trace the history of your waste disposal by listing in chronological order the sanitary landfills IWD has utilized for the disposal of your waste since 1956.

- (A) From 1956 to 1960, your waste material was dumped at the Roger Groves Landfill located on River Road, Dayton, Ohio.
- (B) For the period from 1960 to 1966, your waste was taken to both the above Groves Landfill and Sanitary Landfill Inc. (a subsidiary of IWD) located on Dorothy Lane.
- (C) From 1966 to 1971, we used North Sanitary Landfill, Inc. (a subsidiary of IWD) located on the east side of Valleycrest Drive.
- (D) From 1971 to 1976, two sites were used; North Sanitary Landfill, Inc. (a subsidiary of IWD) located on the west side of Valleycrest Drive, and Sanitary Landfill, Inc. (a subsidiary of IWD) located on Cardington Road.
- (E) From 1976 to 1979, only Sanitary Landfill, Inc. on Cardington Road was utilized.
- (F) Effective in October 1979 to the present, your waste has been dumped at North Sanitary Landfill Inc. (a subsidiary of IWD) located on Pinnacle Road.

All of the above disposal sites either were or are properly licensed by all local, state, and federal regulatory agency requirements in existence at their respective times of operations.

Dayton Tire & Rubber  
Mr. Ralph Ball  
May 7, 1980  
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As soon as possible, IWD would like to be informed of a definite timetable for us to begin removing our waste removal equipment from your plant. In addition, we are interested in purchasing the one stationary compactor owned by DT&R which is used for corrugated recycling. We are also interested in purchasing your tire shredder.

Please do not hesitate to call with any questions or problems.

Sincerely yours,

*Dennis R. Mantel*

Dennis R. Mantel  
Vice President of Sales

DRM;kb

SOLID

ROFFLE

Category	A Amount of Waste in Fiscal 1977 (Thousands of Pounds)	B Is the Mat'l. Hazardous? <sup>(1)</sup> Yes or No (If Yes, State Class <sup>(2)</sup> )	C Current Method of Disposal <sup>(3)</sup> (Check appropriate column)		E Sold (Show Approx. \$/lb realized)	F Remarks Brief remarks to clarify amount, disposi- tion, etc., (or plans you have to reduce amount of current waste, if possible)
			Sent to Dump or Landfill	Given Away (e.g., picked-up or no-charge)		
I. CURED RUBBER MATERIALS						
A. Tires	5,875.1	A	3,737.0	86.8	\$15,000/2.048.	Sold to Xylos--lost on freight.
B. Tubes	N/A					
C. Bladders, Airbags, Flaps	528.4	A	146.0		\$2,031/181.4	Found buyer for bladders 4/77.
D. Trimming Vents	415.8	A	413.8			Trying to get power company to burn for fuel.
E. Trimming flash (included in "D")						Items D, E, F & G. If feasible, could
F. Grinding Dust	247.0	A	247.0			eliminate these items to landfill.
G. Lab Test Samples	12.1	A	12.1			
H. Other						
II. PLANT "GREEN" AND OTHER COMPONENT ITEMS.						
A. Green Tires	265.5	A	14.9		\$3,733/251.4	252.6 lbs. --one-shot, not normal.
B. Bend Wire	19.9	A	19.9			
C. Unencolendered Fabric: Nylon	1.9	A	1.9			
Polyester	1.3	A	1.3			
Fiberglass	.3	A	.3			
Rayon	0		0			
Steelcord	0		0			
D. Colendered Fabric: Nylon	593.6	A	0		\$24,030/593.6	Nylon, Poly. and glass combined. Sold and
Polyester						recycled.
Fiberglass						
Rayon						
Steelcord	8.6	A	8.6			
E. Compoundings:						
Oil						
Carbon Black	215.6	?	215.6			Carbon black and pigments.
Pigments						
Rubber (Synthetic & Natural)	222.5	A	222.5			
Fires, mixed compounds						
Solvents (in liquid form)						
F. Bantary sludge (See III C)						
G. Misc:						
III. OTHER MANT./MAINTENANCE/STORES, ETC. <sup>(4)</sup>						
A. Metals: Aluminum	.8	No			\$163/.8	Recycle.
Copper/Brass	4.6	No			\$1,793/4.6	Recycle.
Lead	0					
Zinc	0					
Cast Iron	0					
Steel (incl. sheet metal)	332.3	No			\$6,619/332.3	Recycle.
Stainless Steel	0					
Unsorted metals	0					
Other	0					

Category	A Amount of Waste in Fiscal 1977* (Thousands of Pounds)	B Is the Mat'l. Hazardous? (1) Yes or No (If Yes, State Class (2))	Current Method of Disposal (3) (Check appropriate column)			F Remarks Brief remarks to clarify amount, disposition, etc., (or plans you have to reduce amount of current waste, show % if possible)
			C Sent to Disp or Landfill	D Given Away (e.g., picked-up or no-charge)	E Sold (Show Approx. \$/# realized)	
B. Lubricating oils (machines or vehicles) (in gallons)	4,171	A			\$175/4,171	Recycle fuel oil.
C. Machine shop lubricants (cu. yds.)	2.2	A	2.2			All greases and oil in same container.
D. Waste water treatment solids other than above (in gallons)	15,120	?	15,120			
E. Air treatment particulates	0					
F. Batteries (in units)	225	H			\$324/225	Recycle
G. Misc. trash from offices, cafeteria, break areas, etc. (cu. yds.)	9,005	A	9,005			
H. Other:						
V. PACKAGING MATERIALS						
A. Cardboard	599.3	A			\$7,250/599.3	Recycle paper products.
B. Waste paper	61.9	A			\$2,354/61.9	
C. Paper bags (in 111 G)						
D. Polyethylene (in 111 G)	51.4	A	51.4			Estimated poundage on 4 mos. sales, '78.
E. Burlap or Fabric pkg. (in 111 G)						
F. Drums: Metal (in units)	795	?			\$2,375/795	Have buyer currently.
Cardboard (in 111 G)						Volume reduction by shredding or sale to pallet reconitioner.
G. Wood Products: Wooden pallets (cu. yds)	11,120	?	10,120	1.0		
Wooden crates						
Other						
H. Misc: Strapping						Included in scrap steel.

Note: (1) Hazardous per DOT; consider the residual properties of the waste material.

(2) General Hazardous Material Classes (show class code):

Code	Code	Code
A Flammable Materials	F Oxidizers	K Etiological Agents
B Combustible "	G Organic Peroxide	L Radioactive
C Pyrophoric "	H Corrosive Material	M Magnetic Materials
D Explosives	I Poisons	N Pyrophoric Solids
E Compressed Gases	J Irritating Material	O Other Regulated Materials

(3) Disposition: If answer is given away or sold, state disposition and if known how utilized under F.—Remarks:

Example: Sold - recycled for paper products

Given away - use unknown

(4) On-it construction and grounds maintenance debris such as masonry, brick, etc. (However, all other materials must be included in above sections as applicable.)



WASTE TYPE

WASTE FOR WASTE DISPOSAL

Franklin, Michigan

WASTE TYPE

WASTE TYPE

DATE 12-13-78

WASTE TYPE

A Amount of Waste in Fiscal 1978 \$ (Thousands of Pounds)	B Is the Material Hazardous? (If Yes, State Class)	C Sent to Dump or Landfill	D Current Method of Disposal <sup>(3)</sup> (Check appropriate column)		E Sold (How Approx. \$/lb realized)	F Remarks Brief recurring to clarify disposal tion, etc., (or plans for how to reduce amount of current waste for next year)
			Given Away (e.g., picked-up or no-charge)			
CURED RUBBER MATERIALS						
A. Tires	A	7,500.0	12,202.7	3210/210.0		Continued to pursue recycle efforts
B. Tubes						
C. Bladders, Linings, Flaps	A	11.2		31,107/320.0		Had buyer 78 no buyer at present
D. Tires, Vents	A	105.0				
E. Tires, Linings, Included in D	A	209.7				Continue to pursue possible recycle
F. Grinding Dust	A	12.4				
G. Lab Test Samples						
H. Other						
PLASTIC WASTE AND OTHER COMBUSTIBLE WASTE						
A. Green Tires	A	14.1				
B. Black Tire	A	57.2				
C. Unlaminated Fabric: Nylon	A	2.5				
Polyester	A	1.2				
Fiberglass	A	.08				
Rayon	A	0				
Steelcord	A	0				
D. Laminated Fabric: Nylon	A	570.8		314,108/528.8		Recycled
Polyester		in with nylon				
Fiberglass		in with nylon				
Rayon		0				
Steelcord		0				
E. Composites:						
Oils						
Carbon Black		69.8				
Pigments						
Resin (Synthetic & Natural)						
Fires, filled compounds		332.9		3172/10.4		Some sale of def stock
Solvents (in liquid form)						
F. Battery sludge		2,160				
G. Misc:	A					
(see, yds.)						
OTHER WASTE/CONTAMINATED WASTE, ETC. <sup>(4)</sup>						
A. Metals:						
Aluminum		5		164/1.5		Recycled
Copper/Brass		7.0		3972/7.0		Recycled
Lead						
Zinc						
Cast Iron						
Steel (incl. sheet metal)		121.9		8,596/121.9		Recycled
Stainless Steel						
Unsorted metals						
Other						

WASTE PROFILE

	A	B	C	D		E	F
	Amount of Waste in Fiscal 1978 * (Thousands of Pounds)	Is the Mat'l. Hazardous? ① Yes or No (If Yes, State Class ②)		Current Method of Disposal ③ (Check appropriate column)			Remarks
				Sent to Dump or Landfill	Given Away (e.g., picked-up or no-charge)	Sold (Show Approx. \$/% realized)	Brief remarks to clarify amount, disposi- tion, etc., (or plans you have to reduce amount of current waste, show % if possible)
D. Lubricating oils (machines or vehicles) (in gallons)	3,843					\$194/3843	Recycled into fuel oil
C. Machine shop lubricants (cu. yds.)	see II 0	A					
D. Waste water treatment solids other than above (in gallons)	12,656	T	19,656				
E. Air treatment particulates	0						
F. Batteries (in units)	185	H				\$266/185	Recycled
G. Misc. trash from offices, cafeteria, break areas, etc. (cu. yds.)	7,614		7,614				
H. Others:							
PACKAGING MATERIALS							
A. Cardboard	359.1	A				\$5,378/359.1	Recycled
B. Waste paper	67.5	A				\$1,686/67.5	Recycled
C. Paper bags							
D. Polyethylene	37.7	A					
E. Burlap or Fabric pkg.						\$2873/37.7	Recycled
F. Drums: Metal in units	1,018					\$4,206/1,018	
Cardboard in units	364					\$255/364	
G. Wood Products: Wooden pallets cu. yds.	2,044		8,064	500		\$893/2,623	Volume reduction thru shredding and resale of some scrap pallets. Generation figure is under stated as figures are calculated from amount hauled to the dump.
Wooden crates	in with pallets						
Other	in with pallets						
H. Misc. Strapping	in with steel						

1. Hazardous per DOT; consider the residual properties of the waste material.

2. General Hazardous Material Classes (show class code):

Code	Code	Code
A Flammable Materials	F Oxidizers	X Etiological Agents
B Combustible "	O Organic Peroxide	L Radioactive
C Pyrophoric "	H Corrosive Material	M Magnetic Materials
D Explosives	I Poisons	N Pyrophoric Solids
E Compressed Gases	J Irritating Material	O Other Regulated Materials

3. Disposition: If answer is given away or sold, state disposition and if known how utilized under F.—Remarks:

Example: Sold - recycled for paper products

Given away - use unknown

4. Omit construction and grounds maintenance debris such as masonry, brick, etc. (However, all other materials must be included in above sections as applicable.)